

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

KAJEET, INC.,

Plaintiff,

v.

MOSYLE CORPORATION,

Defendant.

C.A. No. 1:21-cv-00006-MN

JURY TRIAL DEMANDED

**DEFENDANT MOSYLE CORPORATION'S MOTION TO DISMISS PLAINTIFF
KAJEET, INC.'S FIRST AMENDED COMPLAINT**

Defendant Mosyle Corporation ("Mosyle") respectfully moves this Court to dismiss Plaintiff Kajeet, Inc.'s ("Kajeet") claims for direct, indirect, and pre-suit willful infringement of U.S. Patent 8,667,559, along with Kajeet's past damages claim, pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure for failure to state a claim upon which relief can be granted.

The grounds for this motion are further set forth in Mosyle's Opening Brief in Support of its Motion to Dismiss Kajeet's First Amended Complaint, which is being filed contemporaneously herewith.

Dated: March 25, 2021

FISH & RICHARDSON P.C.

By: /s/ Nitika Gupta Fiorella

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